



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Application granted. The initial
pretrial conference is hereby
adjourned until December 3, 2021
at 2:45 p.m.

SO ORDERED.

Hon. Ronnie Abrams
September 8, 2021

Re: *Yang v. Garland, et al.*, No. 21 Civ. 3480 (RA)

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Application to Register Permanent Residence or to Adjust Status (Form I-485). On behalf of the government, I write respectfully to request an on-consent extension of time of sixty days to respond to the complaint (*i.e.*, from September 9 to November 8, 2021). I also respectfully request that the initial conference presently scheduled for September 24, 2021, be adjourned to the week of November 15, 2021 or thereafter.

The extension is respectfully requested to allow the plaintiff additional time to respond to USCIS’s Request for Evidence (“RFE”) relating to the Form I-485. (The August 16 date for the response to the RFE is extended due to the COVID-19 pandemic.) Assuming that the plaintiff submits her RFE response in the coming weeks, USCIS may be able to proceed to take adjudicative action within the requested extended period, which potentially would render this action moot. This is the government’s third request for an extension of the deadline to respond to the complaint and to adjourn the initial conference.¹ Plaintiff consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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cc: Counsel of record (via ECF)

¹ On May 21 and July 22, 2021, the government requested an extension of its time to respond to the complaint and an adjournment of the initial conference in light of the pendency of the RFE. See ECF Nos. 7, 9. The Court granted the requests. See ECF Nos. 8, 10.